

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IT IS SO ORDERED.
s/ Dan Aaron Polster
DAN AARON POLSTER
U.S. DISTRICT JUDGE
Dated: 12/10/2024

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

City of Rochester v. Purdue Pharma L.P.,
No. 19-op-45853 (Track 12)

MDL 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL ITS RESPONSE TO
EXPRESS SCRIPTS' OBJECTIONS TO DISCOVERY RULING NO. 14, PART 33**

This is a motion under Local Rule 5.2 seeking leave to file under seal Plaintiff's Response to Express Scripts' Objection to DR No. 14, Part 33 [ECF No. 5795]; Motion for Interlocutory Appeal Pursuant to 28 U.S.C. § 1292(B), together with its supporting exhibits. A proposed order is attached to this motion as Exhibit 1.

Local Rule 5.2 provides, "No document will be accepted for filing under seal unless a ... court order authorizes the filing of sealed documents." Plaintiff's Response refers throughout to documents produced by Express Scripts, which Defendant has designated confidential in their entirety under the governing protective order. *See* ECF Nos. 441, 1357. Accordingly, all of this information is subject to the Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal. *See* ECF No. 1813.

Plaintiff does not believe this information warrants sealing and withholding from the public. Nonetheless, Plaintiff seeks to comply with all applicable orders concerning designated confidential information. Plaintiff respectfully requests to proceed in this manner so there is no inadvertent disclosure of such information.